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IQVIA Inc. and IMS Software Services, Ltd.*

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

IQVIA INC. and IMS SOFTWARE
SERVICES, LTD.,

Plaintiffs –
Counterclaim Defendants,

v.

VEEVA SYSTEMS, INC.,

Defendant –
Counterclaim Plaintiff.

Case No.: 2:17-cv-00177-JXN-JSA

Hon. Julien Xavier Neals
Hon. Jessica S. Allen, U.S.M.J.
Hon. Dennis M. Cavanaugh, Ret.
U.S.D.J.

Return Date: To Be Determined

Oral Argument Requested

**PLAINTIFFS' NOTICE OF MOTION FOR PARTIAL SUMMARY JUDGMENT
ON PLAINTIFFS' TRADE SECRET CLAIMS**

PLEASE TAKE NOTICE that on a date to be determined by the Court, Plaintiffs IQVIA Inc. and IMS Software Services, Ltd. (collectively, "IQVIA") will move before the Honorable

Julien Xavier Neals, United States District Judge for the District of New Jersey, at the Martin Luther King Building & United States Courthouse, 50 Walnut Street, Newark, New Jersey 07102, for an Order granting summary judgment on two issues that (1) IQVIA's proprietary compilations of healthcare information (OneKey, DDD, and Xponent) qualify for trade secret protection under federal and state law; and that (2) Defendant Veeva Systems, Inc. ("Veeva") misappropriated those compilations by, among other things, improperly acquiring and using them to build its own competing offering (Veeva OpenData).

PLEASE TAKE FURTHER NOTICE that in support of this motion, IQVIA will rely on the accompanying Statement of Undisputed Material Facts, Brief in Support of Motion for Partial Summary Judgment, and Declaration of Michelle Schmit, with accompanying exhibits.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted with this motion.

PLEASE TAKE FURTHER NOTICE that IQVIA requests oral argument.

Dated: June 17, 2024

/s/ Amy Luria

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